

FILED

**IN THE UNITED STATES DISTRICT COURT FOR THE
EASTERN DISTRICT OF VIRGINIA**

2015 FEB -3 P 12:43

Alexandria Division

UNITED STATES OF AMERICA

v.

ANTHONY VASILIADES,

Defendant.

)
)
)
)
)
)

Criminal No. 1:15-MJ-22

CLERK US DISTRICT COURT
ALEXANDRIA, VIRGINIA

CONSENT MOTION TO EXTEND TIME FOR INDICTMENT

The United States of America, by and through its attorneys, Dana J. Boente, United States Attorney for the Eastern District of Virginia, and Tobias D. Tobler, Assistant United States Attorney, with the express consent of the defendant, and the defendant's counsel, respectfully move the Court to extend the time to indict this case through and including March 14, 2015. In support thereof, the parties state as follows:

1. The defendant was arrested on federal charges on or about January 14, 2015. On January 15, 2015, the defendant made his initial appearance in the Eastern District of Virginia, and was detained pending a combined preliminary and detention hearing set for January 16, 2015.

2. On January 16, 2015, the Honorable Ivan D. Davis held a combined preliminary and detention hearing. After consulting with counsel, the defendant waived his right to contest probable cause. The government did not seek the defendant's detention pending trial. The defendant was released subject to pretrial conditions and supervision.

3. The Speedy Trial Act requires that the defendant be indicted within 30 days of the defendant's arrest after subtracting all excludable time. A conservative estimate of the indictment deadline is February 13, 2015. The parties jointly request an extension of approximately 30 days for an extension of the time to indict. Extending this time period for approximately 30 days

would be in the best interests of justice in that it would give the defense counsel an opportunity to meet with the defendant, to review discovery, and to discuss possible cooperation and a possible pre-indictment plea resolution of the case.

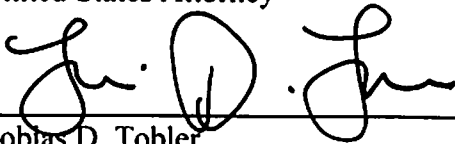
4. The defendant hereby agrees to waive any objections under the Speedy Trial Act and to extend the government's time to file an indictment in this case through and including March 14, 2015. The waiver is made knowingly, intentionally, and voluntarily by the defendant, and with full knowledge of the provisions of the Speedy Trial Act, Title 18, United States Code, Sections 3161, *et seq.*, and with the advice and consent of counsel.

5. The defendant expressly understands that his waiver is not predicated upon any promises, agreements, or understandings of any kind between the government and the defense in this case, and that nothing contained herein shall be construed to preclude the government from proceeding against the defendant during or after the time period covered by this waiver.

WHEREFORE, the parties request that the time to indict this case be extended to and including March 14, 2015 and that the delay resulting from this extension be excluded in computing the time within which an indictment must be filed pursuant to Title 18, United States Code, Section 3161(h).

Respectfully submitted,

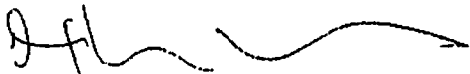
Dana J. Boente
United States Attorney



Tobias D. Tobler
Assistant United States Attorney

Defendant's Signature: I hereby agree that I have consulted with my attorney and fully understand all my rights with respect to a speedy trial, including my right to be charged by indictment within 30 days of arrest, as required by Title 18, United States Code, Section 3161(b). I have read this motion for an extension of time to be charged by indictment, and carefully reviewed every part of it with my attorney. I understand this motion and voluntarily agree to it.


Date: 02/02/2015



Anthony Vasiliades
Defendant

Defense Counsel Signature: I am counsel for the defendant in this case. I have fully explained to the defendant the defendant's right to be charged by indictment within 30 days of arrest. Specifically, I have reviewed the terms and conditions of Title 18, United States Code, Section 3161(b), and I have fully explained to the defendant the provisions that may apply in this case. To my knowledge, the defendant's decision to agree to an extension of time to be charged by indictment is an informed and voluntary one.

Date: 2/2/15



Nina J. Ginsberg
Counsel for the Defendant